



16 October 2020

Hon. Michelle L. Phillips, Secretary
NYS Board on Electric Generation Siting and the Environment
3 Empire State Plaza
Albany NY 12233

Re: Case 17-F-0619 – Application of Hecate Energy Greene 1 LLC, Hecate Energy Greene 2 LLC, and Hecate Energy Greene County 3 LLC for a Certificate of Environmental Compatibility and Public Need Pursuant to Article 10 of the Public Service Law for Construction of a Solar Electric Generating Facility Located in the Town of Coxsackie, Greene County

Dear Secretary Phillips:

My name is Kim Rose, and I have been a resident of Greene County for over 40 years. I currently reside in Coxsackie, where I am a stakeholder in the Article 10 siting process for Hecate Energy's Greene County Solar Facility.

My work is in design, most recently collaborating to build passive, tiny, off the grid eco homes. I am acutely aware of our need to find alternatives to fossil fuels, and my life's work is an attempt to do my part.

For the last two and a half years I have been the spokesperson for the group Saving Greene: Citizens for Sensible Solar. This organization was formed by a group of Coxsackie residents when they became aware that two of the largest solar projects in NYS at that time had been proposed in their community. The Hecate facility would have a nameplate capacity of 50 MW while Flint Mine Solar was a 100 MW plant. They would be located directly adjacent to one another, with overlapping construction schedules.

At that time, approximately 3,000 acres in a small section of Coxsackie had been secured by solar developers for at least seven utility-scale plants. Between the two Article 10 facilities alone a thousand acres would be covered with half a million solar panels.

We soon discovered that due to our proximity to two major transmission lines, Coxsackie is ideally located for solar developers. No other town in NYS has been asked to host two Article 10 projects. Currently the NYISO IR queue for large projects and additional documents show that Coxsackie is being asked to host solar projects totaling at least 180 MW: more nameplate

capacity in one town than all large projects in Ulster (40 MW), Orange (40 MW), Rockland, Westchester, Putnam, Dutchess, and Columbia (80 MW) combined. Historically utility-scale solar plants have drawn a great deal of opposition. The question has to be asked: just how much solar is Coxsackie expected to take for the team?

Saving Greene's opposition has revolved around five issues:

Environmental

Economic

Scale and location

Public safety

Hecate Energy

Environmental issues

- The facility would be constructed on extensive wetlands.
- Rare grassland habitat would be further fragmented.
- The site is home to endangered and threatened species such as the short-eared owl and the Northern harrier hawk.
- Other animals, particularly our large deer herds and coyotes, are already moving into more densely populated areas and spilling onto our roadways. The combination of two plants could see an even greater displacement.
- The project would be built within the watershed of a Class A lake that has experienced problems with turbidity and toxic algal blooms. The recent Princeton Hydro (PH) reports support the public's concerns.

Economic issues

- No electricity from the plant would be sold locally. We have been informed by Hecate that our electric rates will not decrease if their facility is built here.
- Pre COVID-19, our unemployment rate was approximately 5%, and local businesses have struggled to find employees. It is speculated that the 120 installers Hecate has stated they will hire for the construction phase will most likely be brought in from out of the area.
- Our community has already spent upwards of \$200,000 collectively in legal fees over the course of the last two and a half years. Almost a year remains before the Siting Board makes a decision on this and the Flint Mine project. Legal fees are an added burden that will only be passed on to the taxpayers as the intervenor funding offered is grossly insufficient.

- In the pre-pandemic real estate market, our local agents reported lost sales with just the prospect of these projects coming in, and home values decreasing between 20-40% depending on proximity to the plant.
- The currently proposed PILOT is approximately \$4.5 million spread over 35 years and divided six ways. The annual total would be \$128,000, with the school receiving \$64,000 of that. Our school budget is \$32 million. The offer is insulting.
- Recycling in the US is not currently available for most solar panels. Economic trends and conditions are nearly impossible to foresee over a 35-year period; therefore how can a realistic salvage value of materials be calculated? Also, a decommissioning bond to cover all contingencies requires that the bond holder remains financially stable over the next 35 years. In the event that decommissioning funds are not available, no backup plan seems to exist. The cost of decommissioning would then be transferred to the landowner and/or municipality.

Scale and location issues

- The direct footprint of the facility would be nearly 400 acres covered with 145,000 solar panels, plus access roads, inverters, utility poles and transmission lines, and miles of chain link fencing topped with razor wire.
- The site is zoned Rural Residential.
- The arrays would be constructed on valuable prime farmland and farmland of statewide importance. This acreage is in active agricultural production.
- As originally sited, the facility would have been in the viewshed of over 100 homes, some with panels on two or more sides.
- The project would be located just outside the historic village of Cocksackie, in a green valley with sweeping views.
- The project would abut another Article 10 plant double its size. The developer of Flint Mine Solar has been much more willing to listen and accommodate the communities' wishes, however.

Public safety issues

- Based on Princeton Hydro (PH) engineering reports commissioned by the Sleepy Hollow Lake Homeowners Association, the consolidated runoff from both solar projects may cause not only the lake's sediment issues to grow worse, but also flooding in the event of heavy rains. This is cause for concern by the Village of Athens as the integrity of the earthen dam built over 40 years ago is in question. This dam is all that stands between the historic village and the lake.
- The protocol to extinguishing a potential fire within the Hecate Greene facility area has been vague. The community is unclear as to how an electrical fire would be put out if water cannot be used. If chemicals will be implemented this will impact the watershed

which feeds Sleepy Hollow Lake. Apart from being told our fire department will be receiving a shiny new utility vehicle, this residential neighborhood is unclear as to how the developer and fire department are prepared to handle such an event.

Developer issues

- Hecate Energy is an Illinois-based developer; they will be selling 40% of the project's capacity to utilities based in Connecticut. This fails to fully support the spirit of Article 10 or the Clean Energy Standard. Taxpayers are funding another state's clean energy goals.
- Hecate has hosted one open house upon introduction in 2018. Due to an issue with mailing addresses, only a small fraction of stakeholders actually received the announcement. The community was assured the problem had been remedied for the next event. The second (virtual) open house just took place October 14th, again with stakeholders not receiving the postcard notification, myself included. 15 attendees participated. Hecate's additional public outreach has consisted of project managers attending town and village meetings with handouts, and a meeting hosted at the library with a limit of six residents.
- To this day many residents know little or nothing about the facility, and it was primarily through Saving Greene's petitioning and public meetings that the community is even aware that this project.
- On 30 October 2018, Saving Greene was told that as we had engaged an environmental attorney, all questions would have to be asked and answered via counsel. This places an unreasonable burden on active stakeholders who are simply seeking clarification and information from a direct source rather than from rumors.
- Hecate has stated they are negotiating a PILOT, but the Greene County IDA has refused to negotiate after the town board passed a resolution opposing the Hecate project on 10 July 2018.
- Last year our group circulated a proposal for managing Article 10 solar development in Cocksackie. We proposed a partnership between the community and the developers that would minimize environmental impacts and social conflicts. It would have required Hecate a minimal downsize in capacity, however, which they refused. Our document and the wide acceptance it received constitute evidence that Saving Greene and Cocksackie are far from a NIMBY community, and that Hecate is not truly concerned about the welfare of the people who reside here.
- Hecate has presented various marketing spins to garner approval:
 - They have stated that they plan to use pollinator "meadows" between rows of panels. On closer examination, they appear to be using ordinary grass, which will require mowing and potentially the use of herbicides.
 - They have proposed grazing sheep amongst wetlands surrounded by packs of coyotes

- Two hundred acres would be set aside for conservation—with bike paths and trails. This is habitat for endangered species, not a recreational venue.
- A favorite: proposal of a possible micro-brewery attached to the site.
- Hecate offered to build a solar plant for the town on a brownfield site in the village. Construction costs would be taken out of the PILOT, however, and such a plant would be too small to seriously offset the cost of residential electricity in Coxsackie.

In short, everything that could be wrong with a solar project applies to the planned Hecate facility. If this project is approved, it will set a precedent across the state that no community is safe from the irresponsible siting of major utility-scale solar facilities.

Judges, we don't envy your position and are empathetic with all the decision-makers on this project. We imagine there is enormous pressure to support our governor's ambitious renewable energy goals. We ask you however to scrutinize the impacts this project will have on our community. Our environment. Our quality of life.

As a long-term resident, I have seen this area finally coming alive in the last few years. We are at a crossroads, however, between financial growth due to increased tourism, or the potential of becoming an industrialized community. Please know that your decision in this case will not only impact our community now, but the future lives of our children.

Thank you again for your time, and for your just, unbiased, and integrity-based consideration of this project's siting.

Sincerely,

Kim Rose

Spokesperson for Saving Greene